

REMARKS

At the time the Office Action was mailed on March 5, 2007, claims 1-18 and 20-23 were pending, with claim 19 previously having been canceled.

Claims 1, 9, and 16 are currently amended.

Claims 8, 11, and 21 are presently canceled.

Thus, claims 1-7, 9-10, 12-18, 19-20, and 22-23 remain pending.

Applicants and their attorney thank the Examiner for accepting the previously-filed response and, as a result, withdrawing the objections to the abstract and the specification.

Rejections under 35 U.S.C. § 103

Claims 1-7, 9-10, 12-18, 20, and 22-23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Harold, "XML Bible" (Harold), in view of Ayers, "AbiWord's Potential" (Ayers), and Rohr, "RE: Styles Again" (Rohr). Applicants note that in the summary paragraph on Page 3, the Office Action indicated that claims 1-9, 11-12, 14-15, and 23 were rejected under 35 U.S.C. § 103(a) over Harold in view of Ayers and Rohr. However, because claims 8 and 11 were expressly only objected to on Page 9, Applicants conclude that claims 8 and 11 were not rejected. On the other hand, even though the rejections were not listed in the summary, claims 10, 13, 16-18, 20, and 22-23 were expressly rejected in the detailed paragraphs on Pages 7-8 of the Office Action, Applicants conclude the detailed paragraphs on Pages 7-8 are controlling.

Applicants currently amend claim 1 to recite subject matter that applicants understand to be allowable as indicated in the Office Action at Page 9 and as explained below. Applicants submit that this amendment renders moot the rejection of claim 1. Correspondingly, because

claims 2-7 depend from and apply additional limitations to claim 1, claims 2-7 are allowable for at least the same reasons for which claim 1 is allowable. Thus, applicants submit that the amendment to claim 1 also renders the rejection moot with regard to claims 2-7. Claim 8 is presently canceled, thus the rejection is moot with regard to claim 8. Applicants respectfully submit that the rejection under 35 U.S.C. § 103(a) of claims 1-7 should be withdrawn, and that claims 1-7 are in condition for allowance.

Applicants also currently amend claim 9 to recite subject matter that applicants understand to be allowable as indicated in the Office Action at Page 9 and as explained below. Applicants submit that this amendment renders moot the rejection of claim 9. Correspondingly, because claims 10 and 12-15 depend from and apply additional limitations to claim 9, claims 10 and 12-15 are allowable for at least the same reasons for which claim 9 is allowable. Thus, applicants submit that the amendment to claim 9 also renders the rejection moot with regard to claims 10 and 12-15. Claim 11 is presently canceled, thus the rejection is moot with regard to claim 11. Applicants respectfully submit that the rejection under 35 U.S.C. § 103(a) of claims 9-10 and 12-15 should be withdrawn, and that claims 9-10 and 12-15 are in condition for allowance.

In addition, applicants also currently amend claim 16 to recite subject matter that applicants understand to be allowable as indicated in the Office Action at Page 9 and as explained below. Applicants submit that this amendment renders moot the rejection of claim 16. Correspondingly, because claims 17-18, 20, and 22-23 depend from and apply additional limitations to claim 16, claims 17-18, 20, and 22-23 are allowable for at least the same reasons for which claim 16 is allowable. Thus, applicants submit that the amendment to claim 16 also

renders the rejection moot with regard to claims 17-18, 20, and 22-23. Claims 19 and 21 are canceled, thus the rejection is moot with regard to claims 19 and 21. Applicants respectfully submit that the rejection under 35 U.S.C. § 103(a) of claims 16-18, 20, and 22-23 should be withdrawn, and that claims 16-18, 20, and 22-23 are in condition for allowance.

However, notwithstanding that the amendments render the rejections moot, applicants feel compelled to traverse the rejections. Applicants submit that the foregoing rejections fail to present a *prima facie* case of obviousness because neither of the combinations of references recites all of the limitations recited in the claims as required by the Manual of Patent Examining Procedure. *See* MPEP § 706.02(j) (“the prior art reference (or references when combined) must teach or suggest all the claim limitations”). Respectfully, Ayers fails to teach what the Office Action asserts it teaches, and the combinations using Ayers thus fail to teach all of the limitations recited in independent claims 1, 9, and 16.

Specifically, Ayers fails to teach all of the limitations of claims 1, 9, and 16 because Ayers cannot possibly teach or suggest both “internally representing an application document in an application, wherein the internal representation is in a format that is native to the application” and “mapping the determined properties of the style into at least one of a markup language element, an attribute, and a value; and storing the mapped properties of the style in the markup language document.” As expressly stated by the Office Action, Ayers teaches a system in which “An *.abw file [the standard file format of the word processor described by Ayers] ***is written in XML and thus is also in ASCII format; the files can be read by any text editor.***” (Ayers; Page 2, Paragraph 4, cited by the Office Action on Page 4; emphasis added). If Ayers’s storing of its documents natively in XML and ASCII is considered “internally representing an application

document in an application, wherein the internal representation is in a format that is native to the application,” then it cannot also teach “mapping the determined properties of the style into at least one of a markup language element, an attribute, and a value; and storing the mapped properties of the style in the markup language document.”

To find that Ayers teaches all those limitations fails to give effect to the limitations recited in the claim, because if Ayers’s documents already are stored in XML, there would not and could not be any mapping into a markup language and storing in a markup language. In fact, because Ayers expressly describes storing documents in these virtually universal standard file formats, Ayers teaches away from “mapping the determined properties of the field into at least one of a markup language element . . . and storing the mapped properties of the field in the markup language document.” Thus, applicants respectfully submit that the Office Action fails to present a *prima facie* case of obviousness. As a result of the amendments described below and the shortcomings of Ayers, applicants request that the rejection under 35 U.S.C. § 103 be withdrawn against all of the pending claims.

Allowable Subject Matter

Claims 8, 11, and 21 were objected to as being dependent upon a rejected base claim. However, the Office Action indicates the claims would be allowable if rewritten in independent form including the limitations of the base claim from which each depends. Applicants hereby amend claim 1 to recite what applicants understand to be the allowable subject matter recited in claim the limitations of allowable claim 10. Applicants also hereby both amend claim 9 to recite what applicants understand to be the allowable subject matter recited in claim 11 and amend

claim 16 to recite what applicants understand to be the allowable subject matter recited in claim

21. Applicants respectfully request that each of the independent claims now recite allowable subject matter and, thus, are in condition for allowance.

Applicants wish to clarify what they mean by “recite what applicants understand to be the allowable subject matter.” Specifically, claims 8, 11, and 21 each recite the following substantive limitation:

[W]herein the markup language document is manipulated on a server to substantially reproduce the style of the word-processing document notwithstanding the presence of an application that generated the markup language document.

Without wanting to put words in the Examiner’s mouth, applicants infer that the Examiner’s allowance of claims 8, 11, and 21 is premised on the fact that the markup language document is capable of being manipulated on a server or another system on which the application that created the document is not installed. This underscores the portability of the document, more so than the server actually manipulating the markup language document.

Applicants have amended the independent claims to recite the subject matter understood to be allowable. Claim 1 as amended, is reproduced below as an example:

1. (Currently Amended) A method for representing style information in a markup language document, comprising:
internally representing an application document in an application, wherein the internal representation is in a format that is native to the application and the internal representation comprises unique properties for describing styles within the document, wherein the unique properties are defined by the application
determining one or more unique properties corresponding to a style that relates to at least one section of the application document;
mapping the determined properties of the style into at least one of a markup language element, an attribute, and a value; and
storing the mapped properties of the style in the markup language document, wherein the markup language document is manipulable on a system

including one of a server and another system to substantially reproduce the list without using the application that generated the markup language document.

Applicants respectfully submit that claim 1 as amended recites the allowable subject matter previously recited in claim 8. Claim 8 is presently canceled. Thus, applicants submit that claim 1, as well as claims 2-7 which depend from claim 1, are in condition for allowance.

In addition, applicants also have amended claim 9 to recite the allowable subject matter previously recited in claim 11. Claim 11 is presently canceled. Applicants submit that claim 9, as well as claims 10 and 12-15 which depend from claim 9, are in condition for allowance.

Applicants also have amended claim 16 to recite the allowable subject matter previously recited in claim 21. Claim 21 is presently canceled. Applicants submit that claim 16, as well as claims 17-18, 20, and 22-23 which depend from claim 16, are in condition for allowance.

CONCLUSION

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicants at the telephone number provided below.

Respectfully submitted,

MERCHANT & GOULD P.C.



Frank J. Bozzo

Registration No. 36,756

Direct Dial: 206.342.6294

MERCHANT & GOULD P.C.
P. O. Box 2903
Minneapolis, Minnesota 55402-0903
206.342.6200

